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George B. South (GS3904)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: : **Chapter 11**
: :
BETHLEHEM STEEL CORPORATION, : **Case Nos. 01-15288 (BRL)**
et al. : **through 01-15302, 01-15308**
: **through 01-15315 (BRL)**
Debtors. :
: **(Jointly Administered)**
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**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICES AND SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the law firm of King & Spalding LLP appears in the above-captioned bankruptcy cases on behalf of The Bethlehem Steel Corporation Liquidating Trust (the "Trust"). Pursuant to § 1109(b) of the Bankruptcy Code, 11 U.S.C. § 101 et seq. (the "Bankruptcy Code") and Rules 2002, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), the undersigned requests that all notices given, or required to be given in these proceedings, and all papers served, or required to be served in these proceedings, be given to and served upon the undersigned attorneys, at the address set forth below:

KING & SPALDING LLP
1185 Avenue of the Americas
New York, New York 10036-4003
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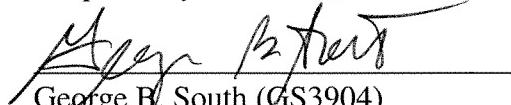
PLEASE TAKE FURTHER NOTICE, that this request also includes all papers, reports, orders, notices, copies of applications, motions, petitions, disclosure statements, plans of reorganization, pleadings, appendices, exhibits, requests or demands whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, delivery service, telephone, facsimile, telegraph, telex or otherwise. This request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, all orders and notices of any application, motions, petition, pleadings, complaints, or demands, statements of affairs, operating reports, schedules of assets and liabilities, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail delivery, telephone, telex or otherwise, which affect or seek to affect in any way the rights of the Trust in these proceedings.

PLEASE TAKE FURTHER NOTICE, that neither this Notice of Appearance, nor any later pleading, claim or suit shall waive: (1) the Trust's right to have final orders in non-core matters entered only after de novo review by a District Court Judge, (2) the Trust's right to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (3) the Trust's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, defenses, setoffs, or recoupments to which creditors are or may be entitled under agreements, in law or equity, all of

which rights, claims, actions, defenses, setoffs, and recoupments the Trust expressly reserves.

Dated: New York, New York
January 22, 2004

Respectfully submitted,



George B. South (GS3904)
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